

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Christine M. Griffin

Debtor

CHAPTER 13

No. 19-03415

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the Debtor, Christine M. Griffin, and M&T Bank, by and through their respective undersigned counsel, and the Chapter 13 Trustee as follows:

1. Debtor commenced the within Chapter 13 bankruptcy case on August 9, 2019.
2. M&T Bank is a creditor secured by a mortgage on Debtor's real property at 289 Ringtown Boulevard, Ringtown, PA 17967.
3. M&T Bank has filed a proof of secured claim in the total amount of \$465,771.02 at Claim 3-1.
4. Debtor and M&T Bank have agreed to the treatment of M&T Bank's secured claim.
5. Debtor filed a First Amended Chapter 13 on May 12, 2020, which plan provides that M&T Bank's secured claim shall be crammed down to \$200,000.00, to be paid with interest at 4.00% per annum in payments of \$1,000.00 per month during the 60 months of the Chapter 13 plan, with the balance due to be paid in a balloon payment outside of the plan.
6. The parties enter into this Stipulation to clarify the specific date on which the balloon payment shall be due.
7. The balloon payment to M&T Bank of the balance of principal and interest from the \$200,000.00 cram down shall be due on August 1, 2024.
8. Time shall be of the essence with respect to the balloon payment, and if M&T Bank has not received the balloon payment by August 1, 2024, M&T Bank shall have immediate relief from the automatic stay with regard to the property at 289 Ringtown Boulevard without further order of court.
9. If the instant bankruptcy is converted to Chapter 7 or is terminated by dismissal, this agreement shall be null and void, and is not binding upon the parties.

10. The provisions of this stipulation do not constitute a waiver by M&T Bank of its right to seek relief from the automatic stay if Debtor defaults on the payments under the Chapter 13 plan.

11. The parties agree that a facsimile signature shall be considered an original signature.

Date: May 13, 2020

/s/ James C. Warmbrodt, Esquire

James C. Warmbrodt, Esquire
Attorney for M&T Bank

Date: July 2, 2020

/s/ Mark J. Conway, Esquire

Mark J. Conway, Esquire
Attorney for Debtor

Date: 7/10/2020



Agatha McHale, Esq.

for Charles J. DeHart, III, Esquire
Chapter 13 Trustee